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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMAR JONES et al,

Defendants.

CASE NO. 1:24-CR-00209-KES-BAM

STIPULATION TO CONTINUE STATUS  
CONFERENCE; AND ORDER

IT IS HEREBY STIPULATED by and between Michele Beckwith, Acting United States Attorney and Robert L. Veneman-Hughes, Assistant U.S. Attorney, as well as Eric Kersten, attorney for defendant JAMAR JONES, and Anthony Capozzi, attorney for defendant STEPHANIE FERREIRA, and Steven Crawford, attorney for defendant JERMEN RUDD that the status conference set for May 14, 2025 at 1:00 pm before the Honorable Barbara A. McAuliffe be continued to August 27, 2025 at 1:00 p.m.

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. The parties need additional time to further investigate/explore matters related to resolving the case or setting a trial date.
2. Prior to the last scheduled status conference in March, all defendants requested plea offers from the government. Because of the nature and circumstances of this case, the government had to consult with the victim's family prior to extending offers. The government has now met with the family

1 of the victim, met with some defense counsel, and is finalizing offers to extend within the next several  
2 days. Because of the seriousness of the charges, the government intends to give defendants at least one  
3 month to consider any offer.

4 3. Should the case not resolve by the next status conference, the parties will meet and confer  
5 about trial dates.

6 4. By this stipulation, the parties now move to continue the status conference, and to  
7 exclude time from May 14, 2025 to August 27, 2025.

8 5. The parties agree and stipulate, and request that the Court find the following:

9 a) The government has represented that the initial discovery associated with this  
10 case includes investigative reports, and related documents, photographs, etc., in electronic form.  
11 All of this discovery has been either produced directly to counsel and/or made available for  
12 inspection and copying. Defense would like additional time to review discovery, and investigate  
13 the foundation for a resolution by plea or trial further.

14 b) The government does not object to the continuance.

15 c) An ends-of-justice delay is particularly apt in this case because:

- 16 • Defendant needs additional time to review discovery, and conduct additional  
17 investigation; and  
18 • The parties need additional time to investigate/explore matters related to  
19 proceeding via plea or trial.  
20

21 d) Based on the above-stated findings, the ends of justice served by continuing the  
22 case as requested outweigh the interest of the public and the defendant in a trial within the  
23 original date prescribed by the Speedy Trial Act.

24 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
25 et seq., within which trial must commence, the time period of May 14, 2025 to August 27, 2025,  
26 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv) because  
27 it results from a continuance granted by the Court at defendants' request on the basis of the  
28 Court's finding that the ends of justice served by taking such action outweigh the best interest of

1 the public and the defendants in a speedy trial.

2 6. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
3 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
4 must commence.

5  
6 Dated: May 5, 2025

Respectfully submitted,

7 MICHELE BECKWITH  
8 Acting United States Attorney

9 By /s/ Robert L. Veneman-Hughes  
10 ROBERT L. VENEMAN-HUGHES  
Assistant United States Attorney

11 Dated: May 5, 2025

/s/ Eric Kersten  
12 ERIC KERSTEN  
13 Attorney for Defendant Jamar JONES

14 Dated: May 5, 2025

/s/ Anthony Capozzi  
15 ANTHONY CAPOZZI  
Attorney for Defendant Stephanie FERREIRA

16 Dated: May 5, 2025

/s/ Steven Crawford  
17 STEVEN CRAWFORD  
Attorney for Defendant Jermen RUDD

18 **ORDER**

19 IT IS SO ORDERED that the status conference is continued from May 14, 2025, to **August 27, 2025,**  
20 **at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe.** Time is excluded pursuant  
21 to 18 U.S.C. § 3161(h)(7)(A), B(iv). **However, in any request for a continuance, the parties shall explain**  
22 **when they will be ready to set a trial date.** The parties should be prepared to pick a trial date at a future  
23 status conference in 2025.

24  
25 IT IS SO ORDERED.

26 Dated: May 8, 2025

/s/ Barbara A. McAuliffe  
27 UNITED STATES MAGISTRATE JUDGE  
28